

TCAG Landscapes Review Consultation Response

Introduction

Thames Crossing Action Group is a community group which represents thousands of people who are strongly opposed to the proposed Lower Thames Crossing (LTC). The £8.2bn LTC would be hugely destructive and harmful; it would not meet the project objectives, and is not fit for purpose.

Background

The proposed LTC would, by National Highways own admission¹, have a large adverse impact on Kent Downs Area of Outstanding Beauty.

Not only that, as a result of the proposed LTC there are other projects being progressed like the Blue Bell Hill Improvements² which fall within the Kent Downs AONB.

In fact originally when route options for the LTC were being considered there was an Option C Variant that was Option C (of which C3 ended up being the preferred route) along with improvements to Blue Bell Hill (A229).

This variant was not progressed at route options stage because according to National Highways (or Highways England as they were then known)³:

“Assessment of the C variant options determined that they did not help to transfer traffic from the existing Dartford Crossing on to the new route at location C. It also had substantial impacts on the Kent Downs Area of Outstanding Natural Beauty (AONB)”

This seems ironic considering that Option C and the C variant are now both being progressed individually.

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<https://www.whatdotheyknow.com/request/712493/response/1711296/attach/3/Appraisal%20Summary%20Table%20only.pdf>

² <https://www.kent.gov.uk/roads-and-travel/road-projects/planned-road-projects/a229-blue-bell-hill>

³5.1.4 -

https://highwaysengland.citizenspace.com/ltc/consultation/supporting_documents/LTC%205%20The%20Case%20for%20the%20Project.pdf

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Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

Yes

We need to do everything we can to protect our landscapes and biodiversity, because we need to address the climate emergency we are living in, and the need to ensure the future of a planet that can sustain a healthy future for us all, whether that be wildlife and their habitats, or human existence.

We also need to properly recognise the general benefits to our health and well-being in having landscapes and natural environment accessible to all. And if these areas are healthy and thriving they should provide us with healthy space to exercise and enjoy, and provide a natural environment that is beneficial to our mental health and well-being also.

Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Climate should definitely be a priority, as should air, noise, light pollution, cultural heritage and more.

Basically we need to prioritise taking care of all aspects of AONBs, and ensure that we protect them from destructive and harmful developments/projects, and climate change.

We cannot allow projects like the proposed LTC to be pushed through when they are so destructive and harmful. It is ridiculous that on one hand government are proposing protecting AONB and other areas, planting trees, cleaning air, addressing climate change, but at the same time investing so much money into projects like the proposed LTC. We can't be saying one thing, whilst doing the opposite. If we continue in this way it counteracts the actions of protecting these important landscapes and biodiversity.

Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes?

No comment

Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

The proposed LTC would see a huge loss of agricultural land, including grade 1 listed land. We are also aware that agricultural land plays its part in AONBs on various levels. Therefore

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we support any provisions to help protect and support agricultural land, both inside and outside of AONBs, from development.

Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

Yes, being able to spend time in the natural environment is proven to be beneficial to our health and well-being, so we need to do all we can to protect it so that we can enjoy it.

This is another concern with the proposed LTC, that it would disconnect communities and the natural environment. As well as negatively impacting the experience of spending time in the AONB and surrounding areas.

Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

Yes, we need to do all we can to protect our natural environment, and not allow destructive and harmful projects like the proposed LTC to disconnect and negatively impact those landscapes and communities.

Are there any other priorities that should be reflected in a strengthened second purpose?

More importance needs to be given to protecting AONB and their surrounding areas from destructive and harmful developments. The value of our natural environment and biodiversity needs to be prioritised over financial growth and benefit. Money is worth nothing without clean air and a healthy planet to sustain us ongoing.

Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures?

Since our group represents those opposing the LTC which does not fall within a National Park or Broads, we decline to comment on this question thank you.

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Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

Since our group represents those opposing the LTC which does not fall within a National Park or Broads, we decline to comment on this question thank you.

For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power?

Since our group represents those opposing the LTC which does not fall within a National Park or Broads, we decline to comment on this question thank you.

Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

Unsure, but definitely there should be consideration given to allow AONB etc to deal with these anti-social behaviours, so possibly on a case by case basis rather than a general ruling.

The more important aspect is to stop new roads that are destructive and harmful being built.

What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

No comment

What roles should AONBs teams play in the plan-making process to achieve better outcomes?

Whilst we appreciate the implications it has on AONB teams to respond to consultations, we do feel it important that they have their say, and that their response carry some weight.

We feel that it should not just be for planning/developments literally in the AONB area, but also in the neighbours areas surrounding the AONB as that too has an impact on the AONB.

Publicly sharing responses to consultations would also help achieve better outcomes, as it would be sharing the knowledge and experience of the AONB teams with the public. We are finding it very beneficial to read Kent Downs AONB response to LTC consultations.

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We feel it could also be beneficial for AONB teams to work with local community groups in regard to campaigning to protect AONBs. It would be beneficial to local community groups to learn and gather information in regards to objecting to developments that would impact AONBs. Good communications and working together would mean support both ways, and a stronger stand protecting the AONB and surrounding areas.

Should AONB teams be made statutory consultees for development management?

Yes

Having read through Kent Downs AONB consultation responses to the proposed LTC, it is very clear that they have a lot of very valid concerns and points they are raising. It should be essential for AONB teams responses to hold more weight in the decision making process.

If yes, what type of planning applications should AONB teams be consulted on?

AONB teams should be consulted on all planning applications that require an Environmental Impact Assessment and are categorised as 'major development' as well as Nationally Significant Infrastructure Projects.

Which of the following measures would you support to improve local governance?

No comment

Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

Yes we believe that more weight should be given to protecting AONBs etc. Kent Downs AONB have been strongly opposed to the proposed LTC, for very good reason since before the 'preferred route' was announced, and yet still the project is being progressed. The more weight organisations like AONBs and others have to help strengthen opposition to projects like LTC which would be hugely destructive and harmful the better.

Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

No comment

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Should National Parks Authorities and the Broads Authority have a general power of competence?

Since our group represents those opposing the LTC which does not fall within a National Park or Broads, we decline to comment on this question thank you.

If you have any further comments on any of the proposals in this document, please include them here.

Just really to say that we need to see actions to back up all the talk on so many things on so many levels right now. Our government seem to do a lot of talking with little action. We hear of things like protecting 30% of UK land for nature by 2030, planting X amount of trees, and so many other things. But at the same time our government are investing time and money into hugely destructive and harmful projects like the proposed LTC.

Yes it is important to protect our Areas Of Outstanding Natural Beauty, National Parks, Broads, and other areas that are deemed to need protection, which is great, but we also need to remember that if we continue to destroy the other 70% it is not going to be a good outcome. It shouldn't and can't be about only upping our game in protecting these important areas and site, we need to see protection for the whole country. We hope that changes resulting from this consultation will be a starting point to making our whole country an area of outstanding natural beauty, and that beauty reflects a healthier country for the natural environment and all of us.

Thank you for allowing us the opportunity to take part in the consultation. Should you wish to discuss any of our comments, and/or our fight against the proposed Lower Thames Crossing, please don't hesitate to visit our website and/or get in touch! Together we are stronger!

Other Info

Prepared and submitted on behalf of Thames Crossing Action Group by Laura Blake, Chairperson. We agree to our response being published. Our group represents those in Kent, Thurrock, Essex, the London Borough of Havering, and many other areas.

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